



- Plaintiff Mohammed Karam's tax returns for the years 2014–2018; and
- Plaintiff Melendez's itemized statement of claimed damages.

The Plaintiffs agree that these remaining discovery items should be produced and have consented to the following relief requested by MB DRC in order to resolve the motion to compel:

- Plaintiffs Melendez, Trota-Litsey, Blazian Promotions, Elmadani Karam, and Mohammed Karam shall each accurately complete and execute IRS Form 4506 authorizing MB DRC to obtain copies of each of the Plaintiff's tax returns for the years 2014–2018 and shall return the completed forms to counsel for MB DRC within ten (10) days of the date of this Order;
- Plaintiffs Melendez, Trota-Litsey, Blazian Promotions, Elmadani Karam, and Mohammed Karam shall each accurately complete, execute, and submit IRS Form 4506-T to obtain copies of each of the Plaintiff's tax transcripts for the years 2014–2018 within ten (10) days of the date of this Order and shall forward copies of the tax transcripts to counsel for MB DRC within ten (10) days of receipt of same from the IRS;
- Plaintiff Melendez shall serve supplemental discovery responses setting forth an itemized statement of his claimed damages within ten (10) days of the date of this Order; and
- Failure by any Plaintiff to comply with the requirements above shall result in the dismissal of that Plaintiff's claims, with prejudice, in accordance with Fed. R. Civ. P. 37(b)(2)(A)(v).

Now therefore, based on consideration of the submissions of the parties and the parties' consent, it is hereby ORDERED that MB DRC's motion to compel is GRANTED and the Court hereby orders the following relief:

- (a) Plaintiffs Melendez, Trota-Litsey, Blazian Promotions, Elmadani Karam, and Mohammed Karam shall each accurately complete and execute IRS Form 4506 authorizing MB DRC to obtain copies of each of the Plaintiff's tax returns for the years 2014–2018 and shall return the completed forms to counsel for MB DRC within ten (10) days of the date of this Order;
- (b) Plaintiffs Melendez, Trota-Litsey, Blazian Promotions, Elmadani Karam, and Mohammed Karam shall each accurately complete, execute, and submit IRS Form 4506-T to obtain copies of each of the Plaintiff's tax transcripts for the years 2014–2018 within ten (10) days of the date of this Order and shall forward copies of the tax transcripts to counsel for MB DRC within ten (10) days of receipt of same from the IRS;
- (c) Plaintiff Melendez shall serve supplemental discovery responses setting forth an itemized statement of his claimed damages within ten (10) days of the date of this Order; and
- (d) Failure by any Plaintiff to comply with the requirements above shall result in the dismissal of that Plaintiff's claims, with prejudice, in accordance with Fed. R. Civ. P. 37(b)(2)(A)(v).

**IT IS SO ORDERED.**

Dated: April 29, 2020

/s/Sherri A. Lydon  
The Hon. Sherri A. Lydon  
U.S. District Judge

**WE SO CONSENT!**

Plaintiff(s)

Defendant(s)

s/TUCKER S. PLAYER  
Tucker S. Player (D.S.C. Bar No. 7512)  
PLAYER LAW FIRM, LLC  
P.O. Box 21005  
Columbia, South Carolina 29221  
Telephone: (803) 772-8008  
E-mail: tucker@playerlawfirm.com

s/ANDREW M. CONNOR  
Andrew M. Connor (D.S.C. Bar No. 11191)  
NELSON MULLINS RILEY & SCARBOROUGH  
Post Office Box 1806  
Charleston SC 29402-1806  
Telephone: (843) 853-5200  
E-mail: andrew.connor@nelsonmullins.com

***ATTORNEYS FOR PLAINTIFF***

***ATTORNEYS FOR DEFENDANTS***

Dated: April 28, 2020